



Robert W. Quinn, Jr.
Federal Government Affairs
Vice President

Suite 1000
1120 20th Street NW
Washington DC 20036
202 457 3851
FAX 202 457 2545

September 6, 2002

Via Electronic Filing

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th St., SW, Room TWB-204
Washington, DC 20554

Re: *Application by Qwest Communications International, Inc., for Authorization to Provide In-Region InterLATA Services in the States of Colorado, Idaho, Iowa, Nebraska and North Dakota*, Docket No. 02-148.

Application by Qwest Communications International, Inc., for Authorization to Provide In-Region InterLATA Services in the States of Montana, Utah, Washington and Wyoming, Docket No. 02-189.

Dear Ms. Dortch:

On Thursday September 5, 2002, David Lawson and Mark Schneider of Sidley Austin Brown & Wood, Len Cali and I met via telephone with Chairman Powell, Chris Libertelli, Chairman Powell's Legal Adviser, John Rogovin and Linda Kinney, both of the Office of General Counsel, to discuss issues related to the aforementioned proceedings. In short, we urged Chairman Powell to reject the Qwest applications for failure to comply with the requirements of the Section 271 checklist as well as on public interest grounds. We went through the arguments previously raised in the comment and ex parte filings previously made in the aforementioned proceedings.

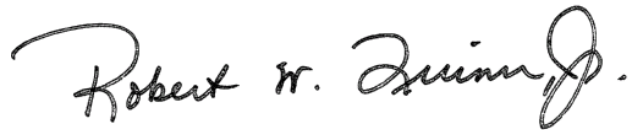
Specifically, we explained that Qwest's August 20 proposal to file some of the secret Interconnection Agreements in its region does not cure the discrimination issues raised by Qwest's secret deals, nor does Qwest's proposal remove the qualification that KPMG has affirmatively made on its third party OSS test results because of the potential that those results

were tainted by preferential treatment given to CLEC secret deal recipients. In addition, we reiterated the fact that serious deficiencies remain with respect to Qwest's operational support systems and pricing of unbundled network elements that individually require the Commission to find that the checklist has not been met and that the public interest would not be served by granting the referenced applications.

Finally, we also stated that Sections 272 (b) (2) and (5) and 272 (c) (5) require that this Commission find that Qwest has conducted its affiliate transactions and kept its books, records and accounts in the manner prescribed by the Commission. Qwest's incorrect affidavits filed at the outset of the proceedings asserting that its long distance affiliate's books, records and accounts had been kept in accordance with Generally Accepted Accounting Principles have now been proven to be incorrect. In addition, Qwest has now admitted that it cannot satisfy the statutory criteria now, on the date of filing or on September 11, 2002; the statutory deadline for this application. Because the facts of this case demonstrate that the Commission cannot make the necessary findings pursuant to Sections 272(b)(2) and (5) and 272 (c)(5), the Commission is also compelled to deny Qwest's application on those grounds as well.

The positions expressed by AT&T were consistent with those contained in the Comments and ex parte filings previously made in the aforementioned dockets. One copy of this Notice is being submitted for each of the referenced proceedings in accordance with the Commission's rules.

Sincerely,

A handwritten signature in black ink, reading "Robert W. Quinn". The signature is written in a cursive, flowing style with a large, stylized "Q" at the end.

cc: Chairman Michael Powell
Christopher Libertelli
John Rogovin
Linda Kinney